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December 10, 2021

By ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Michael Avenatti*, 19 Cr. 373 (PGG)

Your Honor:

I represent Michael Avenatti in the above-captioned case. We submitted a motion for an indicative ruling on December 2 and the government responded this evening in a twelve-page, single-spaced letter. The government's letter raises a number of important legal and factual issues to address and to correct. I therefore respectfully request permission to file a reply no later than December 16.

Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman

Benjamin Silverman

Attorney for Michael Avenatti

cc: Counsel of Record (by ECF)